

RULE 194 REQUEST

1. State the correct names of the parties to the lawsuit.
2. State the names, addresses, and telephone numbers of any potential parties.
3. State the legal theories and, in general, the factual bases of the claims or defenses of your case.
4. State the amount and any method of calculating economic damages.
5. State the names, addresses, and telephone numbers of persons having knowledge of relevant facts, and give a brief statement of each identified person's connection with the case.
6. For any testifying expert -
 - a. state the expert's name, address, and telephone number;
 - b. state the subject matter on which the expert will testify;
 - c. state the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them or, if the expert is not retained by, employed by, or otherwise subject to the control of you, documents reflecting such information;
 - d. if an expert is retained by, employed by, or otherwise subject to the control of you, produce the originals or copies of the following:
 - i. all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - ii. the expert's current resume and bibliography.
7. Produce the originals or copies of any indemnity and insuring agreements described in rule 192.3(f) of the Texas Rules of Civil Procedure. Rule 192.3(f) provides in part as follows:
Indemnity and Insuring Agreements. Except as otherwise provided by law, a party may obtain discovery of the existence and contents of any indemnity or insurance agreement under which any person may be liable to satisfy part or all of a judgment rendered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

8. Produce the originals or copies of any settlement agreements described in rule 192.3(g) of the Texas Rules of Civil Procedure. Rule 192.3(g) provides in part as follows:

Settlement Agreements. A party may obtain discovery of the existence and contents of any relevant portions of a settlement agreement.

9. Produce the originals or copies of any witness statements described in rule 192.3(h) of the Texas Rules of Civil Procedure. Rule 192.3(h) provides in part as follows.

Statements of Persons with Knowledge of Relevant Facts. A party may obtain discovery of the statement of any person with knowledge of relevant facts - a "witness statement" - regardless of when the statement was made. A witness statement is (1) a written statement signed or otherwise adopted or approved in writing by the person making it, or (2) a stenographic, mechanical, electrical, or other type of recording of a witness's oral statement, or any substantially verbatim transcription of such a recording. Any person may obtain, upon written request, his or her own statement concerning the lawsuit, which is in the possession, custody or control of any party.

10. Produce the originals or copies of all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

11. Produce the originals or copies of all medical records and bills obtained by you by virtue of an authorization furnished by us.

12. State the name, address, and telephone number of any person who may be designated as a third party.